



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
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5090
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Ser 09-026
October 29, 2008

Mr. Michael J. Daly
Remedial Project Manager
Federal Facilities Superfund Section
U.S. Environmental Protection Agency (EPA)
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023


Ms. Claudia Sait
Remedial Project Manager
Maine Department of Environmental Protection (MEDEP)
Bureau of Remediation and Waste Management
17 State House Station
Augusta, ME 04333-0017

Dear Mr. Daly and Ms. Sait:

Enclosed you will find the Navy Responses to Regulator Comments (RTCs) on the Draft Sites 1 and 3 and Eastern Plume Monitoring Event 31 Report, September 2007, Naval Air Station (NAS) Brunswick, Maine. These RTCs are provided for your review and concurrence.

If you have any questions or comments, please contact the Navy's Remedial Project Manager, Todd Bober at (215) 897-4911.

Sincerely,


Paul F. Burgio
BRAC Environmental Coordinator
By direction of BRAC PMO

Enclosure:
Navy Responses to RTCs on Draft Sites 1 and 3 and Eastern Plume Monitoring Event 31 Report, September 2007, NAS Brunswick, Maine

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**Responses to Comments Provided by the State of Maine
Environmental Protection Agency on the
Sites 1&3 Eastern Plume Monitoring Event 31 (September 2007) Report, February 2008
Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Claudia Sait, MEDEP Project Manager
Date: June 9, 2008
Respondent: Navy
Date: October 29, 2008

Comment #	Location	Comment	Response
1	General	The data for Monitoring Event (ME) 31 are consistent with the previous few rounds, notable exceptions are included in the specific comments below. Overall the data support the conceptual model for migration of the plume east and south, with increasing concentrations at wells on the southeastern boundary of the plume. Exceedances of drinking water criteria at the "trailing edge" of the plume are driven mainly by the primary volatile organic compounds (VOCs) TCE and PCE, while those at the leading edge are typically due to 1,1 DCE and 1,4 dioxane.	Noted.
2	General	A general concern expressed previously by MEDEP and USEPA is the need for additional groundwater elevation data in the vicinity of the GWETS infiltration gallery, to better evaluate its effect on groundwater flow and plume migration in the western and northern portions of the Eastern Plume. This task could easily be incorporated into the bedrock or 1,4 dioxane evaluation, as it relates to migration from Site 11 to bedrock or overburden, particularly once the infiltration gallery went online.	Noted. In the Fall 2008 LTMP sampling event, synoptic gauging of MW-1101A (in the center of the GWETS infiltration gallery), MW-403 (Southwest of the GWETS infiltration gallery), MW-1104 (South of the GWETS), and MW-NASB-90 (East of the GWETS) will be gauged. Alternatively back up gauging locations are the following: MW-401 and MW-405, which are South of the GWETS. In addition, monitoring wells, MW-403, MW-NASB-90, MW-401, and MW-405 have not been previously gauged as part of the LTMP. In Fall 2008 these wells, will be located, accessed, and determined if usable for additional gauging points.
3	Section 1.4	Please add the grain size method and associated laboratory to the text in this section.	Concur. The grain size method ASTM Standard D422 will be added to Section 1.4 along with the associated laboratory, Accutest Laboratory of Florida.

Comment #	Location	Comment	Response
4	Section 2.1	<p>a.) "Data from the effluent samples collected between the 30 April 2007 and 30 September 2007 indicated no violations of permit discharge limits established by the Brunswick Sewer District."</p> <p>Since the effluent no longer goes to the Brunswick Sewer District and is now a back up system it would be more appropriate to state: "The effluent continues to be discharged to the infiltration gallery, however data from the effluent samples collected between the 30 April 2007 and 30 September 2007 indicated that the effluent would meet the permit discharge limits established by the Brunswick Sewer District if it had become necessary to divert the effluent to the Brunswick Sewer District."</p> <p>b.) "Further, effluent sample levels were non-detect and below MEGs and MCLs."</p> <p>Since 1,4 dioxane has not been non-detection, MEDEP suggests revising to "... were non-detect <u>for VOCs</u> and below <u>the MEG for 1,4 Dioxane</u>."</p>	<p>a) Noted. The recommendation will be added to Section 2.1 to state that, "The effluent continues to be discharged to the infiltration gallery, however data from the effluent samples collected between the 30 April 2007 and 30 September 2007 indicated that the effluent would meet the permit discharge limits established by the Brunswick Sewer District if it had become necessary to divert the effluent to the Brunswick Sewer District."</p> <p>b) Noted. The sentence will state, "...were non-detect <u>for VOCs</u> and below <u>the MEG for 1,4 Dioxane</u>."</p>
5	Section 2.4.1	MW-2101 – The elevated metals detected in groundwater in the Spring 2007 round were absent this round, detected metals returned to typical historic levels.	Noted. No response necessary.
6	Section 2.5.2	<p>a.) MW-308 – Sampling this round by low-flow resulted in detections lower than the previous low-flow in April 2006 but higher than Spring 2007 monitoring event data using PDB methods. Additional data are needed to develop trend information at this location, and are being collected in 2008.</p> <p>b.) MW-331 – Concentration levels for total VOCs rebounded to 2006 levels after declining to historic low values in the Spring 2007 monitoring event. This well continues to show detections for both parent and daughter product VOCs.</p>	<p>a) Noted. No response necessary.</p> <p>b) Noted. No response necessary.</p>
7	Table 1-4	MW-323 needs to be added to the bedrock location section.	Concur. MW-323 will be added to the bedrock location section.
8	Appendix F	If the culverts under the main Weapons Area Road are impounding water to the extent that the leachate seep piezometers or other sample points at Sites 1, 2, and 3 are inaccessible the culverts must be cleared this field season.	Concur. The culverts will be cleared if necessary to allow access to the leachate seep piezometers.

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9	Section 3.1	<p>MEDEP generally accepts the conclusions and recommendations presented in this section, several of which have been implemented in the last year or overtaken by events. Limited comments are as follows:</p> <ul style="list-style-type: none"> Bullet 1: Paragraph 1 states that elevated VOC concentrations were reported in 24 of the 48 monitoring wells samples. However, paragraph 2 also states that elevated VOC concentrations were reported in 13 of 32 wells sampled <i>in the Eastern Plume</i>. If the statement in the first paragraph pertains to Sites 1 and 3 please specify or rectify the inconsistency as necessary. Bullet 3: According to the text, MW-1302D also exceeded regulatory criteria for vinyl chloride, please correct. Bullet 4 and 5: The data from the Mere Brook Investigation indicate that the extraction system has not provided full hydraulic control of the plume, but it has been effective at mass removal of significant VOCs, and targeting of "hot-spots" as proposed should be effective. MEDEP has previously expressed support for modifying the screen at EW-1 to target the deeper portion of the aquifer. Navy should propose a schedule for replacement of the well in the near future, as part of optimization of the extraction system. Bullet 6: Please see previous comments on MW-308, MEDEP agrees the data are very significant. Please note the ME 28 1,1 DCE detection in the text, and the text must note which rounds are by diffusion bags and which are by low-flow. MEDEP also suggests evaluating shallow, mid and deep intervals to determine the optimum PDB placement, and possibly using low-flow and PDB methods concurrently to see if they correlate. 	<p>Noted. The statement pertains to both Sites 1&3 and the Eastern Plume. The statement will state this to avoid any inconsistencies.</p> <p>Concur. MW-1302D will be included in the text showing exceedence of vinyl chloride.</p> <p>Noted. The results of the Mere Brook Investigation were incorporated into the Conceptual Model of the Eastern Plume, Naval Air Station, Brunswick, Maine (Revision 4, July 2008). Once the Navy completes the hydraulic groundwater model for the Eastern Plume, the results from the groundwater model and revised conceptual site model will be used to evaluate the existing extraction well network and its efficiency. The replacement and/or continued use of extraction well EW-1 will be addressed at that time once the model is finalized.</p> <p>Noted. Bedrock well MW-308 was sampled as per the Final LTMP (ECC 2008), which indicates that the well should be sampled twice a year for TCL VOCs using deep passive diffusion bag sampling techniques and for 1,4 dioxane using low-flow cell sampling techniques. It is suggested that additional sampling of this well be conducted during the proposed bedrock evaluation and groundwater sampling in the vicinity of MW-308.</p>
END OF COMMENTS			